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April 8, 2013

Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street, 13<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

RE: Motion for Protective Order and Alternative Energy Resources Report for Calendar Year 2012 in Case No. 13-0732-EL-ACP

To Whom It May Concern:

Please find enclosed the Motion for Protective Order and the Alternative Energy Resources Report for Calendar Year 2012 for Noble Americas Energy Solutions LLC Case No. 13-0732-EL-ACP, with one (1) original and three (3) confidential copies filed under seal. Also included is one (1) redacted public version being filed through the OH DIS system.

If you have any questions, please contact me at (619) 684-8200 or via email at [bwhite@noblesolutions.com](mailto:bwhite@noblesolutions.com).

Sincerely,

Bryan White  
Regulatory Compliance Analyst

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician IN Date Processed APR 12 2013

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER  
ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2012

Case No. 13-0732-EL-ACP

Noble Americas Energy Solutions LLC (hereinafter "CRES") in accordance with Sections 4928.64 and 4928.65, Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Annual Alternative Energy Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

I. Determination that an Alternative Energy Resource Report is Required (check one)

- ☒ During calendar year 2012 the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.
- ☐ During calendar year 2012 the CRES states that it did not conduct retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio. (If this block is checked proceed to the signature line)

II. Determination of the sales baseline for 2012

- a. During the past three calendar years the CRES made retail sales of generation in the amounts shown below
- 2009 ~~0.00~~ MWh
- 2010 ~~0.00~~ MWh
- 2011 ~~0.00~~ MWh
- b. The average annual sales of the active years listed above (sum of the active years' MWh / no. of active years) ~~0.00~~ MWh (hereinafter "Baseline Sales").
- c. If conditions exist that merit an adjustment to the Baseline Sales please list the adjusted Baseline Sales on this line N/A and attach as an exhibit to this AER a full explanation of the reason(s) for the adjustment(s).
- d. If the CRES was not active during calendar years 2009, 2010, and 2011 but did make sales during calendar year 2012, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2012 as would have been projected on the first day retail generation sales were made in Ohio.

CRES was active in 2009, 2010, and 2011.

III. Determination of the number of Solar and Total Renewable Energy Credits (RECs) required and Statement of the Number of RECs Claimed

RENEWABLE ENERGY CREDITS REQUIRED AND OBTAINED FOR 2012

Types	No. of RECs Required (a)	No. of RECs Obtained (b)	Registry (c)	No. of RECs Sited in OH (d)
2012 Solar	<del>_____</del>	<del>_____</del>	GATS	<del>_____</del>
2012 Non Solar	<del>_____</del>	<del>_____</del>	GATS	<del>_____</del>
Total	<del>_____</del>	<del>_____</del>		

- a. Column A above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2012. The determinations were calculated by multiplying the Baseline Sales or Adjusted Baseline Sales or the Projected Sales (circle one) by 6 hundredths of one per cent (0.06%) for Solar RECs and one hundred forty-four hundredths of one percent (1.44%) for Non Solar RECS.
- b. The CRES states that it has obtained in accordance with the Commission's Rules the number of Solar and Non Solar RECs listed in column b above for 2012.  
*Noble Americas Energy Solutions LLC has obtained the sufficient number of Solar and Non Solar RECs listed for 2012.*
- c. Approved registry being used by the CRES. This could be GATS, M-RETS, or if the CRES has RECs with both registries GATS and M-RETS.  
*Noble Americas Energy Solutions LLC used the PJM GATS Registry. Please see Exhibit A.*
- d. The CRES states that of the RECs it has obtained for 2012 the number listed in column d represents the RECs with generation facilities sited within the state of Ohio.  
*Noble Americas Energy Solutions LLC states that the RECs in Column (d) in the above table represent the renewable RECs with generation facilities sited in the state of Ohio.*
- e. CRES states that it has (circle one): a) received a *force majeure* determination for Solar RECs; b) sought but has yet to receive a ruling on a *force majeure* determination for Solar RECs; or c) did not seek or sought and did not receive a *force majeure* determination for Solar RECs.

IV. Compliance (check one)

- ☒ CRES states that it has obtained the required number of Solar RECs and Total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).
- ☐ CRES states that it has obtained the required number of Solar RECs and Total RECs after adjustments permitted pursuant to Rule 4901:1-40-05(A)(3). The type of adjustment, reason for the adjustment and merit for making the requested adjustment of the proposed adjustments are detailed in Exhibit A attached to this Report.
- ☐ CRES states that it is not in compliance with number of Solar RECs or Total RECs required for 2012. However, per rule 4901:1-40-08(A), CRES plans to make an alternative compliance payment based on the shortfall.

V. Ten Year Forecast

a. Ten Year Forecast of Solar and Non-Solar RECs

In accordance with Rule 4901:1-40-03(C) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

Year	Est. Sales	Est. Solar	Est. Non-Solar	Est. Total RECs
2013				
2014				
2015				
2016				
2017				
2018				
2019				
2020				
2021				
2022				

b. Supply Portfolio projection

*Noble Americas Energy Solutions LLC states that it intends to purchase all required RECs, both Solar RECs and Non-Solar RECs from suppliers who have received a renewable energy facility certificate from the Public Utilities Commission, have joined an approved REC registry and will transfer RECs from the generator's account to the CRES account.*

c. Methodology used to evaluate compliance

*Because the generation market is one of great volatility and because customers are free to contract with any CRES supplier, governmental aggregator or utilize a utility standard service offer, Noble Americas Energy Solutions LLC has projected out sales to the end of the current Electric Security Plan period for each of the utility service areas in which it conducts sales based on its most current business plan available at the time of submission of this Report. Since the price to compare will change at the end of the Electric Security Plan, projecting the ability to maintain sales, let alone increase sales, is problematic at best. Thus, the CRES has assumed that load will remain constant, and the increase in total RECs comes from the increase in requirement percentages.*

d. Comments on any perceived impediment(s) to achieving compliance with the Solar and Non Solar REC requirements, as well as any discussion addressing such impediments.

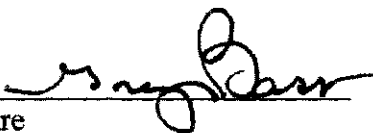
*Noble Americas Energy Solutions LLC has no comments at this time.*

VI. Average Price of RECs

- a. Per order issued in Case No. 12-2668-EL-ACP, please find below the average price paid for each category of REC retired for Ohio AEPS compliance.

Category	\$/REC (average)
Ohio Solar	<del>                    </del>
Other Solar	<del>                    </del>
Ohio Non-Solar	<del>                    </del>
Other Non-Solar	<del>                    </del>

I, Greg Bass, am the duly authorized representative of Noble Americas Energy Solutions LLC. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.

  
Signature